

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TEDDY ARCHER, TREY BERNADOU,)	
SEDETRIC CHAMBLISS, BRODRICK)	
FRANCIS, JAMES HUTCHINSON, DANIEL)	
MANOFSKY, DEVON SPRINGER, ERIC)	
STEWART, ANDREW WALLS, CALVIN)	
WESLEY, AND CHRIS WOODRUFF, ET AL.,)	
)	Civil Action No.: 1:18-cv-00470-RGA
Plaintiffs,)	
)	
v.)	
)	
DEFENDERS, INC.,)	
)	
Defendant.)	
)	

STIPULATION REGARDING STATUS OF OPT-IN PLAINTIFFS

WHEREAS, this is a wage-hour case that is currently conditionally certified as a nationwide collective action under the Fair Labor Standards Act (“FLSA”);

WHEREAS, pursuant to 29 U.S.C. § 216(b), an employee can commence an action on his own behalf and on behalf of other similarly situated employees;

WHEREAS, pursuant to 29 U.S.C. § 216(b), an employee who wishes to participate in such action shall file a consent in writing in the court in which the action is pending, thereby becoming a party in such an action, having opted into the case;

WHEREAS, such “opt-in” plaintiffs are bound by and subject to the Court’s jurisdiction as if listed in the caption and on the docket as named plaintiffs, and continue to be parties to the above-captioned action;

WHEREAS, certain opt-in plaintiffs in the above-referenced action were designated as “Terminated” effective November 1, 2019 but continue to be parties to this action;

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, and subject to approval by the Court, that with the exception of opt-in plaintiffs Robert Harper, Joseph Jarvela, Basil Kenton, Jose Rosales, Brandon Stamper, Jeffrey Dunning, and Manuel Fonseca, who were dismissed pursuant to individual motions to dismiss based on their failure to respond to discovery, any opt-in plaintiffs whose status appears as "Terminated" as of November 1, 2019, should be reinstated as opt-in plaintiffs (but subject to Defendant's right to seek decertification of the conditional class).

Enclosed hereto as Exhibit A is a list of all plaintiffs in this action, including named plaintiffs and plaintiffs who have opted into the conditionally certified FLSA class.

Dated: March 6, 2020

/s/ Brian D. Long

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Counsel for Defendant

IT IS SO ORDERED this 6 day of March, 2020.



RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE

EXHIBIT A

Named and Opt-in Plaintiffs^{1,2}

1. Abersold, Steven	34. Barr, Cody
2. Abiola, Charles	35. Barreras, Felix
3. Adelman, Michael	(Discovery)
4. Adkison, Christopher	36. Bassett, Richard
5. Agana, Enrique	37. Bates, Brendan
6. Aiyebusi, Olugbemiga	38. Beavers, Anthony
7. Akerman, David	39. Beggs, Peter
8. Albarran, Ruben	40. Beierschmitt, Steven
9. Albera, Joseph	(Named) (Discovery)
10. Alejandre Tajimaroa, Irving	41. Belnap, Thane
11. Alvarez, Ricardo	42. Bengel, Shane
12. Ambrister, Lamont	43. Bernadou, Trey
13. Anderson, Matthew	(Named) (Discovery)
14. Annen, Jeffrey	44. Bertoncini, Paul
15. Anthony, Matthew	45. Bittner, Lawrence
16. Archer, Teddy	46. Blair, Christopher
(Named) (Discovery)	47. Blanch, Jose
17. Archero-Rochero, Evian	48. Blandino, Brian
(Named) (Discovery)	49. Blunt, Michael
18. Arefayne, Azaria	50. Bly, Dalton
19. Arguello, Douglas	51. Boll, Jess
20. Armijo, Jacob	52. Bollack, Aaron
21. Armstrong, Tyler	53. Boller, Austin
22. Armstrong, Mychal	(Discovery)
23. Arnold, James	54. Bonilla, Miguel
24. Arrazolo, Caleb	55. Bouchillon, Douglas
25. Arrowood, Rodney	56. Bowery, Travis
26. Ascanio, Andrew	57. Boyd, Gerald
(Named) (Discovery)	58. Bradshaw, Michael
27. Ayala, Hugo	59. Bray, Robert
28. Baker, Aaron	60. Brazell, James
29. Balinton, Maury	(Discovery)
30. Balinton, Mashon	61. Bridges, Samuel
31. Ball, Scott	62. Brooks, Kevin
32. Barbas, Aaron	63. Brooks, Martha
33. Barnes, Marcus	64. Brooks, Joshua

¹ All named plaintiffs in the enclosed list are set forth in bold, with the designation “(Named).” All plaintiffs selected by the parties to participate in discovery are set forth with the designation “(Discovery).”

² Note that Plaintiff Donald Krieger, while listed here, is subject to a pending unopposed motion to dismiss. (See Docket Nos. 126-128 and 132).

- 65. Brown, Cameron
- 66. Brown, Sean
- 67. Brown, Therron
(Discovery)
- 68. Brunson, Nathaniel
- 69. Bryant, Christopher
- 70. Buick, Stephen
(Discovery)
- 71. Burch, Joshua
- 72. Burdette-Chapman, Brendan
- 73. Burditt, Ian (Wade)
- 74. Burillo, Marc
- 75. Burkert, Kevin
- 76. Burnett, Duane
- 77. Burrows, Michael
- 78. Cacopardo, Daniel
- 79. **Canaday, Delric**
(Named) (Discovery)
- 80. Capers, Craig
- 81. Carlson, Chad
- 82. Carr, Mark
- 83. Carrigan, Ryan
- 84. Carter, Christopher
- 85. Carter, James
(Discovery)
- 86. **Casden, Brett**
(Named)
- 87. Casey, Cody
- 88. Cawley, Robert
- 89. Celeste, Charles
- 90. **Chambliss, Sedetrick**
(Named) (Discovery)
- 91. Champagne, Christopher
- 92. Chavez, David
- 93. Chavez, Michael
- 94. Cheely, Jason
- 95. Chester, Robert
- 96. Chin, Michael
(Discovery)
- 97. Clariza, Freddie
- 98. Clarkson, Rodney
- 99. Clausell, Andy
- 100. Clingan, Donald
- 101. Coates, Christopher
- 102. Codrington, Calvin
- 103. Cole, Marlon
- 104. Comer, Justin
- 105. Compton, Dustin
- 106. Conforti, David
- 107. Cook V, Benjamin
- 108. Coombs, Andrew
- 109. Cooper, Daniel
- 110. Corpuz, Julius
- 111. Costanza, Justin
- 112. Creed, William
- 113. **Cromartie, Neill**
(Named)
- 114. Crosson, Timothy
- 115. Crow, Amanda
- 116. Crump, Daniel
(Discovery)
- 117. Cruz, Jose
- 118. Cunningham, Grant
- 119. Dacres, Howard
- 120. Daley, Nathaniel
- 121. Darby, Joseph
- 122. Dauterman, Bryan
- 123. David, Dan
- 124. DeLaPaz, Miguel
- 125. Delgado, Orlando
- 126. Dellert, Scott
- 127. Deol, Jagraj
- 128. Deramo, Brandon
- 129. DiCarlo, John
- 130. Dingler, John
- 131. Dixon, Joseph
- 132. Dobson, Stephen
- 133. Donahue, Eric
- 134. Donnelly, John
- 135. Donovan, David
- 136. Dooley, MichaelKevin
- 137. Dopke, Scott
(Discovery)
- 138. Doty, Richard
- 139. Douglas, Kenneth
- 140. Dougless, Ronald

- 141. Dove, Levell
- 142. Drouvalakis, William
- 143. Duarte, Alex
- 144. Dubois, James
- 145. Duda, Andrew
- 146. Duhon, Eric
- 147. Duncan, Mark
- 148. Dunn, Barry
- 149. Earley, Michael
- 150. Eastern, Travis
- 151. Eloff, Daniel
- 152. Entrekin f/k/a Hill, Ashley
- 153. Evans, Michael
- 154. Evans, Gregory
- 155. Ewbank, William
- 156. Farrell, Gary
- 157. Fazal, Mujeeb
- 158. Febres, Jose
- 159. Ferry, Daniel
- 160. Figueroa, Ismael
- 161. Finch, Randy
- 162. Flores, Jacob
- 163. Flowers, Christopher
(Discovery)
- 164. Flynn, Thomas
- 165. Foley, Jason
(Discovery)
- 166. Forshee, William
- 167. Forster, Christopher
- 168. Fortunato, Todd
- 169. Forwood, Joshua
- 170. Fraley, Gary
- 171. Francis, Brodrick
(Named) (Discovery)**
- 172. Franklin, Bruce
- 173. Frazer, David
- 174. Frederick, Kyle
- 175. Frederick, Brian
- 176. Frias, Steven
- 177. Gabbard, Chris
- 178. Gales, Michael
- 179. Gann, Eric
- 180. Garcia, Marco
- 181. Garnenez, Renaldo
- 182. GarridoRamirez, Enrique
- 183. Gashaw, Walter
- 184. Gassenberger, Scott
- 185. Gebre-Medhin, Tedla
- 186. Gelatt, Wesley
- 187. Gilliland, Raymond
- 188. Godfrey, Greg
(Discovery)
- 189. Goldmann, Christopher
- 190. Gomez, Eric
(Discovery)
- 191. Gomez, Christopher
- 192. Gonzales, Dominic
- 193. Gonzales, Ray
- 194. Gonzalez Jr., Luis
- 195. Goodman, Shaun
- 196. Goodnight, Justin
- 197. Gozumogullari, Mustafa
- 198. Graham, Yaphet
- 199. Grant, Jonathan
- 200. Gray, Matthew
- 201. Green, Benjamin
- 202. Greer, William
- 203. Guclu, Mehmet
- 204. Guest, Jordan
- 205. Hackett, Christopher
(Named)**
- 206. Hailey, Peter
- 207. Halbeisen, John
- 208. Hale, Kelly
- 209. Hall, Brian
(Discovery)
- 210. Hall, Andre
- 211. Halleck, Alan
- 212. Harr, Matthew
(Discovery)
- 213. Harris, Michael
- 214. Harris, Andrew
- 215. Hart, Justin
- 216. Hart, Christopher
- 217. Hartley, Todd
- 218. Harwell, Jeffrey

- 219. Haskins, Greg
- 220. Hebert, Michael
- 221. Hedke, Nicholas
- 222. Heilman, Tyler
- 223. Heimbrock, Andrew
- 224. Hemphill, Tommy
- 225. Henry, Bruce
- 226. Herman, Benjamin
- 227. Hernandez, Manuel
- 228. Herrera, Joshua
- 229. Heymann, Michael
- 230. Hidinger, James
- 231. Hinds, Eric
- 232. Hinshaw, Sean
- 233. Hoffmann, Kristian
(Discovery)
- 234. Hoffner, Craig
- 235. Hogains, Shalinda
- 236. Holbert, Jason
- 237. Holmes, Bryon
- 238. Hopkins, Kendrick
- 239. Hosey, James
(Discovery)
- 240. Huckell, Bryan
- 241. Huet, Justin
- 242. Hume, Jonathan
- 243. Hund, Nicholas
(Discovery)
- 244. Hunt, Darrell
- 245. Hupp, Steve
- 246. Husereau, Scott
- 247. Hutchinson, James
(Named)**
- 248. Hyer, Garrett
- 249. Hylton, Otis
- 250. Ignazi, Brian
- 251. Irey, James
- 252. Irizarry, Luis
- 253. Jackson, Robert
- 254. Jackson-Lee, Ronaldo
- 255. Jean Baptiste, Herby
- 256. Jean Baptiste, Wesler
- 257. Jennings, Richard
- 258. Jensen, Don
- 259. Jerstad, Kenneth
- 260. Jeter, Seth
- 261. Johnson, Anthony
- 262. Johnson, Norris
- 263. Johnson, Christopher
- 264. Johnson, Elliott
(Discovery)
- 265. Johnson, Mark
- 266. Jones, Leon
- 267. Jones-Vaughan, Erin
- 268. Jovanovic, Michael
- 269. Kadow, Steven
- 270. Kalanjian, Georges
- 271. Kalogeropoulos, Nicholas
- 272. Kay, Sean
- 273. Keaton, Robbie
- 274. Keese, Kyle
- 275. Kennan, Christopher
- 276. Kennedy, Rodney
- 277. Kern, Peter
- 278. Khan, Nasir
- 279. Kidwell, Steven
(Discovery)
- 280. Kim, Jae
(Discovery)
- 281. Kimble, Nathaniel
- 282. Kines, Antoine
- 283. King, Jason
- 284. Knighton, Shamar
- 285. Koons, Sean
- 286. Koontz, Nicholas
- 287. Kowalski, Christopher
- 288. Krajacic, Nicolas
- 289. Krieger, Donald
(Discovery)
- 290. LaMastus, Cheryl
(Discovery)
- 291. Lane, Jamie
(Discovery)
- 292. LaNier, Samuel
- 293. Lao, Lance
- 294. Law, Scott

- 295. Le, Dung
- 296. Leba, Kenneth
- 297. Lee, Jason
- 298. Lee, Andrew
- 299. Lee, Stephen
- 300. Leet, Nicholas
- 301. Legg, Matthew
(Discovery)
- 302. Leggins, Michael
- 303. Lewis, Evan
- 304. Lewis, Bradley
- 305. Lievsay, John
- 306. Lindsay, Paul
- 307. Liriano, Marx
- 308. Long, Robert
- 309. Lopez, Joseph
- 310. Lovvorn, Christopher
- 311. Lowe, James
- 312. Lynds, Arthur
- 313. Macharie, Reuben
- 314. Maciel, Ruben
- 315. Magee, Jay
- 316. Makepeace, Jeremy
- 317. Malnati, Anthony
- 318. Malsom, Wayne
- 319. Manausa, Paul
- 320. Mann, Charles
- 321. Mano, Richard
- 322. Manofsky, Daniel
(Named) (Discovery)**
- 323. Marchena, Scott
- 324. Marciel-Nieves, Basil
- 325. Marlin, Marc
- 326. Martin, Bobby
- 327. MartinezMoran, Jose
- 328. Martinsen, Robert
- 329. MataJr, Frank
- 330. Matarazzo, Garrick
- 331. Matthews, Josiah
- 332. Mauss, Jeffery
- 333. Maxey, Robert
(Discovery)
- 334. Mayer, Timothy
- 335. McAtee, Corey
- 336. McCarthy, Dax
- 337. McCauley, Johnathan
(Discovery)
- 338. McClain, Jesse
- 339. McClung, Christopher
(Discovery)
- 340. McCray, Randolph
- 341. McCrayJr, Michael
- 342. McDonald, Michael
- 343. McDonald, Creighton
- 344. McNeill, Timothy
- 345. Medina, Matthew
- 346. Meek, Phillip
- 347. Mendez, David
- 348. Mendoza Olivas, Arnoldo
- 349. Menjivar, Sergio
- 350. Mertes, William
- 351. Michaels, Mark
- 352. Michelsen, Matthew
- 353. Milam, John Matthew
- 354. Milicia, Ross
- 355. Miller, Vance
- 356. Miller, Mark
- 357. MimsJr, Larry
- 358. Minor, Quinn
(Discovery)
- 359. Missick, Jaryn
- 360. Mitchell, Matthew
- 361. Mitchell, Matthew
- 362. Mitsunaga, Corey
- 363. Mize, Ryan
- 364. Moldawski, Mitchell
- 365. Molina, Luis
- 366. Montgomery, David
- 367. Moore, James
- 368. Moreau, Jarod
- 369. Morris, Daren
- 370. Morrison, Stephen
- 371. Moses, James
- 372. Moultrie, David
- 373. Muller, Heath
- 374. Mullins, Matthew

- 375. Murray, Betty
- 376. Nealis, Wesley
- 377. Nelson, Ned
- 378. Newbury, Gary
- 379. Nienau, Nathan
- 380. Ogletree, Coleman
- 381. Orozco Lopez, Luis
(Discovery)
- 382. Owens, Stephen
(Discovery)
- 383. Pace, Troy
- 384. Page, Arron
- 385. Pak, Jin
- 386. Palma, Steven
(Discovery)
- 387. Panaia, Peter
- 388. Papavasiliou, Tharrenos
- 389. Papson, James
- 390. Paquette, Timothy
- 391. Park, Daniel
- 392. Patten, Izaak
(Discovery)
- 393. Paylor, Dominique
- 394. Payne, Craig
- 395. Pearson, Billy
- 396. Pelaez, Luis
- 397. Pelle, Anthony
- 398. Pender, Matthew
- 399. Percival, Trent
- 400. Perdomo, Jonathan
- 401. Perez, Paulo
- 402. Perez, Anthony
(Discovery)
- 403. Perez, Roberto
- 404. Perez, Ramon
- 405. Perry, Jason
- 406. Perry, Leon
- 407. Pesigan, Jason
- 408. Peterson, Billy
- 409. Pfister, Charles
- 410. Pickett, Johnny
- 411. Pierce, Lucas
- 412. Pina, Kyle
- 413. Pinnock, Robert
- 414. Pires, Danielson
- 415. Pohler, Eric
- 416. Porter, Harry
- 417. Porter, William
(Discovery)
- 418. Powell, Kimberly
- 419. Quinn, Eric
- 420. Ramirez, David
(Discovery)
- 421. Ramirez, George
- 422. Ramos, Dale
- 423. Rana, Nayan
- 424. Redmond, Shaun
- 425. Reilly, Matthew
- 426. Renfro, Jason
- 427. Rentz, Trevor
- 428. Richardson, Randy
- 429. Riley, Clint
- 430. Riley, Kenneth
- 431. Rivera, Nomar
- 432. Robbins, Ezekiel
- 433. Roberts, Ryan
- 434. Robichaud, Mark
- 435. Rocco, Anthony
- 436. Rocco, John
(Named) (Discovery)**
- 437. Rocco, Scott
(Discovery)
- 438. Rodriguez, Pedro
- 439. Rodriguez, David
- 440. Rogers, Theophilus
- 441. Rojas, Edgar
- 442. Rojas, Ricardo
- 443. Romero, Matthew
- 444. Rosales, Angel
(Discovery)
- 445. Rosenbalm, Vernon
- 446. Rossman, Shawn
- 447. Rotha, Logan
- 448. Rothenberger, Christopher
- 449. Royal, Brett
(Discovery)

- 450. Rozenburg, Leslie
- 451. Ruiz, Miguel
- 452. Ruiz, Michael
- 453. Ruiz-Echenagucia, Jorge
- 454. Sabat, Francisco
(Discovery)
- 455. Sacco, Michael
- 456. Saltos, Erick
- 457. Sammarco, Jared
- 458. Sanchez, Israel
- 459. Sanchez, Rafael
- 460. Sandoval, David
- 461. Sandoval, Ernesto
- 462. Sawyer, Matthew
- 463. Scotto, Michele
- 464. Scruggs, Landon
- 465. Seda, Chadwick
- 466. Shaddox, Jason
- 467. Shapiro, Justin
- 468. Shelton, Stuart
- 469. Shelton, James
- 470. Shermock, Kevin
- 471. Shivers, Larry
- 472. Shover, John
- 473. Shuford, Edward
- 474. Simpson, Shannon
- 475. Simpson, Ernest
- 476. Sims, Brent
- 477. Singletary, Lamarr
- 478. Skinner, Nathan
- 479. Slaughter, Dwayne
- 480. Slingsby, Todd
- 481. Smallman, Alexander
- 482. Smedley, Jason
- 483. Smith, Herbert
(Discovery)
- 484. Smith, William
- 485. Smith, Edward
- 486. Smith, Zeltre
- 487. Smith, Rodney
- 488. Smith, Brian
- 489. Soberon, Hector
- 490. Sosa, Cesar
(Discovery)
- 491. Soto, Jesse
- 492. Soto, Benjamin
- 493. Speicher, Ralph
- 494. Springer, Devon
(Named) (Discovery)**
- 495. Sproul, Christopher
- 496. Stafford, James
- 497. Stanek, Robert
- 498. Stanley, Gregory
- 499. Stevenson, Dominic
- 500. Stewart, Eric
(Named)**
- 501. Stockwell, Christopher
- 502. Story, James
- 503. Stranz, Timothy
- 504. Stringer, John
- 505. Stupey, Jamie
- 506. Stutts, David
- 507. Swartz, Aaron
- 508. Sweet, David
- 509. Sweet, Christopher
- 510. Talbot, Xavier
- 511. Tapia Pena, Miguel
- 512. Taylor, Charles
- 513. Teagle, Trey
- 514. Temple, Wayne
- 515. Temple, Terrell
- 516. Temple, Valerie
- 517. Tepe, Michael
- 518. Thomas, Larry
- 519. Thomas, Tramario
- 520. Thornton, Anthony
- 521. Todd, Larry
- 522. Tolentino, Samuel
- 523. Tolliver, Ryan
- 524. Tronvig, Erik
- 525. Trujillo, Julian
- 526. Tullos, Miles
(Discovery)
- 527. Twerefour, Terry
- 528. Unthank, Kevin

- 529. Valdez, Benjamin
- 530. Vandermolen, Paul
- 531. Varela, Cesar
- 532. Varela Valenzuela, Alberto
- 533. Vasilyev, Daniel
- 534. Vazquez, Nicholas
(Discovery)
- 535. Veasey, Brieson
- 536. Vega, Robert
- 537. Verdejo, Carlos
- 538. Verdejo Napoleoni, David
- 539. Vermette, Jeremy
- 540. Vinson, Bryson
- 541. Walker, Adam
- 542. Wallace, Matthew
(Discovery)
- 543. Wallace, Brady
- 544. Walls, Andrew**
(Named) (Discovery)
- 545. Walton, Steven
(Discovery)
- 546. Wang, Zheying
- 547. Washington, Everett
- 548. Washington, Alfonso
- 549. Washington, Carl
- 550. Watson, Calvin
- 551. Wenig, Steven
- 552. Wereschagin, John
- 553. Wesley, Calvin**
(Named)
- 554. Wheeler, David
- 555. Wilkerson, Wayne
- 556. Williams, Derrick
- 557. Williams, Richard
- 558. Willis, Michael
- 559. Wilson, James
- 560. Wilson, Tylon
- 561. Wilson, Reginald
- 562. Winn, Bruce
- 563. Wolfle, Sean
- 564. Wood, Walter
- 565. Woodruff, Christopher**
(Named)
- 566. Wright, Brandon
- 567. Wright, Daniel
- 568. Yamaguchi, Kenji
- 569. Younger, Richard
- 570. Zamora, Joseph
- 571. Zelaya, Alberto
- 572. Zepeda, Richard
- 573. Zombek, Edward
- 574. Zornes, Kenneth